

# REPLY

IN THE PROVINCIAL COURT OF BRITISH COLUMBIA (SMALL CLAIMS COURT)

- To a Claim  
 To a Counterclaim

REGISTRY FILE NUMBER
P08-P-C-11 38247
REGISTRY LOCATION
Vancouver

**TO:**

Copy the name, address and telephone number of the claimant from the Notice of Claim.

NAME	Cavliere Financial & Management Inc.	CLAIMANT(S)
ADDRESS	c/o Stewart Aulinger & Company, Barristers and Solicitors	
1200-805 West Broadway		
CITY, TOWN, MUNICIPALITY	Vancouver	British Columbia
PROV.		V5Z 1K1
		TEL. # 604 879 0291
		POSTAL CODE

**REPLY**

**FROM:**

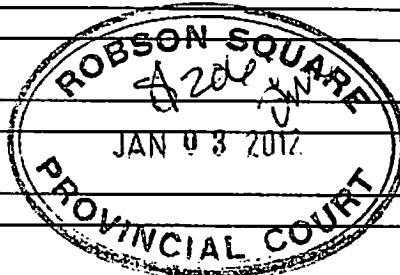
Fill in the name, address and telephone number of the defendant filing this reply.

NAME	Imogo Mobile Technologies Corp.	DEFENDANT
ADDRESS	c/o Shields Harney, Litigation Counsel	
490-1177 West Hastings Street		
CITY, TOWN, MUNICIPALITY	Vancouver	British Columbia
PROV.		V6E 2K3
		TEL. # 604 891 1339
		POSTAL CODE

**DISPUTE:**

Using the "HOW MUCH" section of the Notice of Claim as a guide, tell why you disagree with each part (a - e). If you agree with parts of the claim say so.

- a Please see the attached.  
  
 b  
  
 c  
  
 d  
  
 e



**AGREEMENT WITH THE CLAIM:** I (NAME)

If you agree to pay all or part of what is claimed, make a proposal.

agree to pay \$

I could make the following payments:  
 (GIVE DATES AND AMOUNTS)

Please see the attached.

**COUNTERCLAIM** (YOU SHOULD ONLY FILL OUT THIS PART OF THE FORM IF YOU WISH TO MAKE A CLAIM AGAINST THE CLAIMANT)  
 (THIS PART IS NOT TO BE USED WHEN REPLYING TO A COUNTERCLAIM)

**WHAT HAPPENED?** Please see the attached.

Briefly tell what has led to your counterclaim.

**HOW MUCH?**

Tell what you are claiming. If your counterclaim has more than one part, separate each part and fill in each individual amount, then add the individual amounts to make the total.

- a Please see the attached. Breach of Contract, \$20000.00  
  
 b  
  
 c

DATE MAILED	Jan 6/12
WITH A PLAIN REPLY	<input checked="" type="checkbox"/>
TRAIL STATEMENT	<input type="checkbox"/>
NOTICE	<input type="checkbox"/>
CLERKS INITIALS	= TOTAL CLAIMED
TOTAL \$20,000.00	
+ FILING FEES \$ 206.00	
\$20,206.00	

court copy



**REPLY**

**DISPUTE**

- a) The Defendant disputes any liability to the Claimant. The Claimant did not meet the terms of its engagement or obligations and is not entitled to any remuneration.
- b) The Claimant voluntarily terminated its relationship with the Defendant, and gave up all claims against the Defendant.
- c) Further, the Claimant misused confidential information, acted against the best interests of the Defendant and failed to deliver as promised.
- d) The Defendant has suffered damages as a result, which if the Claimant had a valid claim, which it does not, must be set off from that claim.
- e) If the Claimant had a valid claim, which is denied, it has not mitigated such.

**AGREEMENT WITH THE CLAIM**

The Defendant does not agree with the claim.

**COUNTERCLAIM**

- a) The Claimant did not act in best interests of the Defendant or its Shareholders. The Claimant failed to meet its obligations to the Defendant. The Defendant misused confidential information.
- b) As a result, the Defendant has suffered loss and damage.
- c) The Defendant also seeks punitive and exemplary damages.
- d) The amount of the Defendant's Counterclaim is not quantified at this time.